

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

HMK ENTERPRISES, INC.,
ROBERT ACKERMAN and
STEVEN KAROL,

Plaintiffs,

v.

THE CHUBB CORPORATION,
FEDERAL INSURANCE
COMPANY, CHUBB & SON, INC.,

Defendants.

Civil Action No. 04-12688-MLW

ASSENTED-TO MOTION TO ENLARGE TIME TO RESPOND TO COUNTERCLAIM

Plaintiffs HMK Enterprises, Inc. ("HMK"), Robert Ackerman ("Mr. Ackerman") and Steven Karol ("Mr. Karol") (collectively, "the Insureds") hereby move that the time within which they may respond or otherwise plead to defendants' counterclaim be enlarged by thirty (30) days, up to and including March 23, 2005. As grounds for this motion, Plaintiffs state as follows:

1. Plaintiffs require more time to investigate the allegations of the counterclaim and to prepare a response.

2. Defendants, by their counsel, have assented to this motion.

WHEREFORE, Plaintiffs HMK Enterprises, Inc., Robert Ackerman and Steven Karol hereby respectfully request that the Court enlarge the time within which they may respond to Defendants' counterclaim by thirty (30) days to and including March 23, 2005.

Certification Pursuant to Local Rule 7.1

Pursuant to Local Rule 7.1, the undersigned has conferred with counsel for defendants and counsel for defendants has assented to this motion.

Respectfully submitted,

HMK ENTERPRISES, INC., ROBERT
ACKERMAN and STEVEN KAROL,

By their attorneys,

/s/ Heidi A. Nadel

Howard M. Cooper (BBO #543842)
Heidi A. Nadel (BBO#641617)
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28 State Street
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Assented to:

The Chubb Corporation, Federal Insurance
Company, and Chubb & Son, Inc.,

By their attorneys,

/s/ Stephen J. Abarbanel

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document
was served upon the attorney of record for each other
party by (hand) (mail) on 2/3/05
Heidi A. Nadel